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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RH KIDS, LLC, a California limited liability
company,

Plaintiff,

v.

NATIONAL DEFAULT SERVICING
CORPORATION, an Arizona corporation;
BANK OF AMERICA, N.A., a national banking
association; DOES I through X; and ROE
BUSINESS ENTITIES I through X, inclusive,

Defendants.

Case No.: 2:22-cv-02135-JCM-VCF

**STIPULATION AND ORDER
FOR EXTENSION OF TIME TO
RESPOND TO COMPLAINT**

(FIRST REQUEST)

RH Kids, LLC and Bank of America, N.A. (**BANA**) stipulate as follows:

1. RH Kids served BANA on December 16, 2022.
2. BANA removed this case on December 23, 2022.
3. BANA's response to the complaint is due January 6, 2023.
4. RH Kids intends to file a motion to remand by January 20, 2023.
6. If RH Kids moves to remand, BANA shall have until ten (10) days after the court makes a decision on jurisdiction to file its responsive pleading to the complaint.

7. If RH Kids does not move to remand, BANA shall until February 6, 2023 to file its responsive pleading.

Good cause exists to grant the requested extension. BANA requests additional time to avoid wasting time and resources while it waits for this court's decision on jurisdiction. BANA prefers to file one responsive pleading—either in federal or state court, depending on the court's decision. This is the parties' first request for an extension of this deadline, and is not intended to cause any delay or prejudice to any party.

DATED this 3rd day of January, 2023.

AKERMAN LLP	HONG & HONG LAW OFFICE
<u>/s/ Scott R. Lachman</u> MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 SCOTT R. LACHMAN, ESQ. Nevada Bar No. 12016 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134 Attorneys for Bank of America, N.A.	<u>/s/ Joseph Y. Hong</u> JOSEPH Y. HONG, ESQ. Nevada Bar No. 5995 1980 Festival Plaza Drive, Suite 650 Las Vegas, NV 89135 Attorney for RH Kids, LLC

IT IS SO ORDERED.



Cam Ferenbach
United States Magistrate Judge

DATED 1-3-2023